Case 1:20-cr-00521-CM Document 143 Filed 07/19/21 Page 1 of 2 Case 1:20-cr-00521-CM Document 142 Filed 07/15/21 Page 1 of 2

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Hon. Colleen McMahon Senior United States District Judge United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re:

United States v. Christopher Kraft

Docket No.: 20-CR-521

Dear Judge McMahon:

I am retained counsel to Defendant Christopher Kraft in the above-referenced case. I write to respectfully ask Your Honor to permit Mr. Kraft to travel to Lake George from Monday July 19, 2021 through Saturday July 24, 2021 for a family trip. Mr. Kraft will be staying at the Sagamore in Bolton Landing, 110 Sagamore Rd, Bolton Landing, NY 12814. He will be traveling with his wife, Danielle and his two young children.

By way of background, Mr. Kraft was presented and arraigned on October 1, 2020, before Magistrate Judge Lehrburger. Mr. Kraft was released on a \$250,000 personal recognizance bond secured by one financially responsible person (his wife) and his house. His travel is restricted to the Southern and Eastern districts of New York. Since Mr. Kraft's initial appearance, he has been compliant with all of the terms of his release.

I have spoken to the government by A.U.S.A. Jason Swergold, who consents as long as pretrial has no objection. I've spoken to Pretrial Services by Marnie Gerardino who! has no objection to this request.

> **USDC SDNY** DOCUMENT ELECTRONICALLY FILED DOC #: __

Case 1:20-cr-00521-CM Document 143 Filed 07/19/21 Page 2 of 2

Case 1:20-cr-00521-CM Document 142 Filed 07/15/21 Page 2 of 2

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone Edward V. Sapone

cc: AUSA Jason Swergold, Esq.